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ABSTRACT

The future role and importance of educational evaluation are analyzed in terms of the Educational Consolidation and Improvement Act (1981), a block grant whose provisions minimize planning, reporting, evaluation and accountability requirements to ensure that national goals are met. The background in federal and state evaluation programs is discussed, including the Title I Evaluation and Reporting System (TIERS). The rationale for block grant programs, the advantages and disadvantages, and the basic forms of evaluation and accountability in the law are presented. Within the impact and future directions of evaluation, concern is whether the lack of specificity in block grant legislation is not a deliberate attempt to divest federal funding for education when authorization ends in 1987. Five tenets are presented for a block grant evaluation framework advocated by the Council of Chief State School Offices to ensure that a common core of evaluative data will be available at state and national levels. (Author/CM)

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THE FUTURE OF EVALUATION IN A CLIMATE OF FEDERAL DEREGULATION

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THE FUTURE OF EVALUATION IN A CLIMATE OF FEDERAL DEREGULATION

Background

Evaluation as a discipline has undergone many formative iterations. As J. C. Merwin observes, "Concepts of evaluation have changed over the years. They have changed in relation to such issues as who is to be evaluated, what is to be evaluated, and how evaluations are to be made." Evaluation technology has also advanced over the past two decades bringing along such techniques as the adversary model, discrepancy evaluation, formative evaluation, goal-free evaluation, medical model of evaluation, transactional evaluation, cost-benefit analysis, evaluability assessment and the like. Federal programs also have become more responsive and receptive to the utilization of evaluation methodology. In some cases, this responsiveness of federal programs has been directed from external forces such as from the public and from legislators as a direct result of their quest for program and fiscal accountability, as well as for a demonstration of program and cost benefits.

In the case of Title I, as an example, this external pressure for evaluation has manifested itself in Congress' plea and demands of the United States Office of Education to develop an evaluation and reporting system which would formalize the evaluation of Title I programs across the nation. This force gave rise to the development of the Title I Evaluation and Reporting System (TIERS). Although many state and local educational agencies far surpass TIERS, in terms of both design and sophistication of their evaluation models, nonetheless, TIERS catalyzed positive movement for the field of evaluation. State agencies without clear mandates or guidelines for program evaluation used the TIERS system as a vehicle for evaluating not only Title I programs but other compensatory education programs. In addition to Title I, other federally funded as well as state funded programs during the seventies also carried with them clear directives for program evaluation. These evaluation set-asides prompted advancements and movement in the overall technology of program evaluation. It is apparent that such advances would not have been possible without this type of external stimulus or indeed pressure.

Either through 1) normal maturation, 2) external/internal accountability pressures 3) fiscal constraints or the like, evaluation has emerged into a new decade of heightened usage and is increasingly serving as a catalyst for educational policy making, for legislative action, and for management redirection. This catalytic function of evaluation is especially pivotal at state department of education levels.

However, the current climate of the eighties produces yet the strongest agent or force for evaluation efforts, i.e., shrinking fiscal resources for education spending. This decline in the funding level across the breath of programs necessitates ever more precise pin-pointing of programs that are working or not working—— i.e., the success stories and the failures. Indeed, this provides, it would seem, a significant purpose and mission for evaluation.

Logic——both from federal and state accountability standpoints as well as from cost-effectiveness and cost-benefit viewpoints——would seem to dictate the need for evaluation and preserve the current status and role of evaluation. However, one must examine reality given the nature of the deregulation efforts mandated into law in Washington. On July 31, 1981, the United States Congress passed the "Omnibus Budget Reconciliation Act of 1981" which provided for significant changes in existing federal statues. The act in essence would move toward the realization of the Reagan administration's goal of budgetary restraint and federal deregualtion of domestic programs. For the education sector, the "Omnibus Budget Reconciliation Act of 1981" contained the "Education Consolidation and Improvement Act of 1981." The consolidated grants approach to allocation of funding has reduced, if not severely curtailed, reporting regualtions. One must ask what the potential impact of the dimished evaluation and reporting regulations will have on state agencies and on their ability to monitor,

quality control and evaluate programs at the local level? All of the possibilities and potential outcomes are speculative at best at this point in time. Industry has, when faced with similar budget curtailments, slashed R & D funds but maintained strong evaluation, quality control and quality assurance units. Education, when faced with similar cutbacks, does likewise respective to R & D. It remains to be seen what role evaluation will play in the reduced climate of evaluation and reporting requirements at the national, state and local levels.

Rationale of a Block Grant

Hastings (1982) points out that defining a block grant is amorphous at best. She allows for a range of possibilities in the funding system to encompass on one hand maximum federal regulation to maximum discretion on the part of the recipient on the other hand.

However, at least five key characteristics of a block grant have been identified and described by the Advisory Commission on Intergovernmental Relations (1977) as follows which form the framework for the "Education Consolidation and Improvement Act of 1981:"

- Federal support for a diversity of programs and activities in a broadly configured categorical area.
- Grant recipients have latitude in defining educational need and in designing a program to respond to identified need.
- Planning, reporting, evaluation and accountability requirements are kept to a minimum to insure only that the national goals are being met.
- Statutory formula for the allocation of program funds.
- Eligibility for program participation are defined by statute and in general are targeted to general purpose governmental units.

Given this new approach to the allocation of federal funds, prior to examining the impact the legislation has on evaluation and accountability, the overall advantages and disadvantages of block grants are presented below as described by Levin (1981). (See Figure I.)

FIGURE I

COMPARISION OF ADVANTAGES VS. DISADVANTAGES OF THE BLOCK GRANT APPROACH

ADVANTAGES	DISADVANTAGES
1. Reduction of administrative burden and cost.	1. Defeat purposes of federal aid for specified areas of educational need.
2. Decisions made closer to those affected by them.	2. Allocation of funds without a specified target audience potentially leaves populations in need unserved.
3. Direct block grant funding reduces reporting and monitoring requirements.	3. Block grant funds may be used to replace state and local funds for education.
4. Consolidation of program personnel and procedures.	4. Administrative cost savings of the block grant at the state level are offset by increased cost factors at the local level.
5. Discretion of funding use within broad categorical guidelines—hence more precise pinpointing of program to need area.	

Education Consolidation and Improvement Act of 1981

The Education Consolidation and Improvement Act of 1981 was passed by Congress on July 31, 1981. All chapters of the act will take effect beginning October 1, 1982 and are authorized through FY1987. It was the Reagan administration's intention through the block grants to shift control over educational policy away from the federal government back to state and local agencies. The budget authority for the block grants in 1982 will be reduced to 80 percent of the total sum of the combined programs in 1981.

The basic components of the act which consists of three chapters is described below:

Chapter 1, "Financial Assistance to Meet Special Educational Needs of Disadvantaged Children," is a rewrite of ESEA Title I. The new language draws upon provisions in the old ESEA Title I law such as retaining the allocation formula and the emphasis on low-income children, but also provides some simplification and relaxation of previous requirements.

Chapter 2, "Consolidation of Federal Programs for Elementary and Secondary Education," consolidates ESEA, Titles II through VI, VIII, and IX and supporting authorizations into a single program of grants to states, to be used for the same purposes. There are also some programs and projects to be reserved for the Secretary of Education's discretion.

Chapter 3, "General Provisions," relates to various administrative and accounting requirements, and limits both the authority of the Secretary to issue regulations and the legal standing of the regulations.

Evaluation/Accountability Role Under the Education and Improvement Act of 1981

Traditionally, categorical programs have had a strong political lobby and vested interest group to provide their support base. It is no secret that continued funding for these programs has been guaranteed not on the outcomes of the program or evaluation data but by legislation. Accountability is vested in the cloak of regulation, guidelines and procedure. The preservation of an intact Chapter I — "Financial Assistance to Meet Special Educational Needs of Disadvantaged Children" is a manifestation of the power and concern of the special interest groups for disadvantaged students.

For block grant programs, funds must be allocated and utilized in accordance with law, statute and administrative regulation. Accountability for the block grants will take three basic forms:

1) descriptive reporting of clients served, fiscal accounting, services offered including program description and implementation process,

2) impact (effectiveness) evaluation, and

3) monitoring of programs by advisory groups.

Over the years, educational evaluation, accountability and reporting efforts at national, state and local levels have matured bringing along such models as the Title I Evaluation and Reporting System (TIERS), the Migrant Student Record Transfer System (MSRTS) and many others. The aforementioned are offered as only illustrative examples without comment on technical rigor, adequacy or total acceptance by the evaluation community. The point being made is that evaluation, accountability and program monitoring were coming into their own as tools for enlightened decision-making and program planning and redirection. The sophistication in evaluation is due primarily to

maturation of the field itself but in no small part is also due to the valuation demands placed on state and local program managers by the power of federal statute and regulation. Indeed, federal evaluation regulations have done much to catalyze lethargic state and local agencies into more structure, rigor and technical accuracy and adequacy with respect to evaluation planning, implementation and utilization.

An analysis of the current provisions for evaluation and reporting in the Education Consolidation and Improvement Act of 1981 are minimal (see Figure 2) and pose significant evaluation problems at the local, state and national levels.

FIGURE 2

EVALUATION, REPORTING AND ACCOUNTABILITY CITATIONS IN EDUCATION CONSOLIDATION AND IMPROVEMENT ACT OF 1981

Chapter and Citation Number	Target Area and/or Comments	Citation
Chapter 1: Financial Assistance to meet special educationald needs of disadvantaged children Sec. 555 (d)		(d) Records and Information. Each state educational agency shall keep such records and provide such information to the secretary as may be required for fiscal audit and program evaluation (consistent with the responsibilities of the secretary under this chapter).
Sec. 556 (b)(4)		(b) Application Assurances. The application described in subsection (a) shall be approved if it provides assurances satisfactory to the State educational agency that the local educational agency will keep such recores and provide such information to the state education agency as may be required for fiscal audit and program evaluation (consistant with the responsibilities of the state agency under this chapter), and that the programs and projects described.
	Sustained gains	(4) Will be evaluated in terms of their effectiveness in achieving the goals set for them and that such evaluations shall include objective measurements of educagional achievement in basic skills and a determination of whether improved performance is sustained over a period of more than one year.

Chapter and Citation Number	Target Area and/or Comments	Citation
Chapter 2: Consolidation of Federal Programs for Elementary and Secondary Eduation		
Sec. 564 (a)(2)(G)	Evaluation requirements	(G) the State Legislature: to advise the state educational agency on the allocation among authorized functions of funds (not to exceed 20 per centum of the amount of the state's allotment) reserved for state use under section 565(a) on the formula for the allocation of funds to local educational agencies and on the planning, development, support, implementation, and evaluation of state programs assisted under this chapter.
Sec. 564 (a)(5) and Sec. 564 (a) (6)	Evaluation requirements and and effectiveness evaluation	(5) beginning with fiscal year 1984, provides for annual evaluation of the effectiveness of programs assisted under this chapter, which shall include comments of the advisory committee, and shall be made available to the public and (6) provides that the state educational agency will keep such records and provide such information to the secretary as may be required for fiscal audit and program evaluation (consistent with the responsibilities of the secretary under this chapter).
Sec. 568 (a)(3)		(3) agrees to keep such records and provide such information to the state educational agency as reasonably may be required for fiscal audit and program evaluation consistent with the responsibilities of the state agency under this chapter.
Sec. 573 (a)(5)	Basic Skills Program effectiveness	(5) procedures for testing students and for evaluation of the effectiveness of programs for maintaining a continuity of effort for individual children.

Chapter and Citation Number	Target Area and/or Comments	Citation
Chapter 3: General Provisions		
Sec. 591 (b)	No regulations	(b) In all other matters relating to the details of planning, developing, implementing and evaluating programs and projects by state and local educational agencies the secretary shall not issue regulations, but may consult with appropriate state, local and private educational agencies and upon request, provide technical assistance information and suggested guidelines designed to promote the development and implementation of effective instructional programs and to otherwise assist in carrying out the purposes of this subtitle.

Impact and Future Directions of Evaluation Given the Block Grant Legislation

From a program perspective as well as from an evaluation perspective, the advent of reduced federal control over educational programs both from the funding aspect on throught to the accountability aspect must be viewed on one hand as a significant step forward.

States and local educational agencies now have the latitude to allocate program dollars to areas of need within their own parameters without adhering to prescriptive government guidelines and regulations

States which have clamored that their own evaluation and accountability systems were much more advanced than the evaluation methods advocated by the federal government will once again be free to pursue these methods without the added burden of federal evaluation and reporting mandates and overlays. This new found flexibility permits greater evalatuion emphasis and utility at the local level for decision-making at the same time it compounds the evaluation dilemma at the state and national levels. Evaluation responsibilities exist for both the federal and state governments without any identified or uniform mechanism proposed to conduct any evaluation or indeed collect any descriptive data. Being circumspect, one wonders if the lack of specificity in the block grant legislation in the evaluation area was not a deliberate attempt to divest the federal funding role for education in 1987 when the authorization for the Education Consolidation and Improvement Act of 1981 ceases. Since it will be difficult at best to gather national evaluative or descriptive data on the effectiveness of the legislation, would this not be a reason to curtail expenditures to education?

Additionally, the lack of accountability on the expenditure of funds certainly would not augur well for those groups lacking in political power and lobbying sophistication who must compete with more powerful constitutencies in this time of inflation and budget pressure (Levin, 1981).

Given the vast flexibility in terms of scope of program that the block grant legislation allows at the local level, any aggregation of evaluation data at the state and national levels will be "primitive" at best unless the states adopt "comparable" evaluation and reporting practices. Such an effort is currently underway with the Consolidation Evaluation Task Force sponsored by the Council of Chief State School

Officers (CCSSO). It is the intention of the task force to develop an evaluation framework for the block grant legislation which could have application nationwide. It is hoped that CCSSO will endorse such a mechanism as a viable method to ensure that a common core of evaluative data will be available at state and national levels to justify program expenditure and to document program impact and effectiveness.

The Consolidation Evaluation Task Force advocated the following five tenents as guidance to developing any evaluation system for the block grant legislation (Consolidation Evaluation Task Force, 1981-1982):

1. Evaluations should be appropriate to the scope and nature of the activity being evaluated. Evaluation impact data could continue to be summarized for Chapter I whereas the more varied and smaller in scope nature of Chapter II will require other evaluative approaches.

2. Evaluation approaches at state and local levels should be suggestive. If possible, states should be encouraged to collect a common core of descriptive program data which could then be reported at the national level.

3. SEAs and LEAs should make every effort to collect data for block grant supported programs to assure that funds have been well spent and have had an "impact" for the target audience.

4. The evaluation approaches currently utilized for Title I should be continued as evaluation approaches for Chapter I.

5. For Chapter II, SEAs should collect data on the following two questions in time to have an effect on the federal budget review process:

   - How effectively has the block grant been implemented at the state and local levels?

   - Has the block grant funding met the critical identified needs of school districts?

It remains to be seen, if SEAs and LEAs can rise to the challenge of a creative and responsive approach to the implementation of the block grant legislation without setting back good evaluation and reporting practices lightyears away.

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